

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
_____)	

**Requests for Review of Administrative Decisions Regarding Mobile
Line Count Reporting of Cordova Wireless Communications, LLC**

The Alaska Telephone Association (“ATA”) offers these comments in support of Cordova Wireless Communications, LLC’s (“CWC”) request for review of a USAC determination that certain lines were not eligible for universal service support under section 54.370(b) of the Commission’s rules.

Being cognizant of the seasonal fluctuations in the commercial fishing industry in Alaska and understanding that many of the people engaged in the industry, even if they are not residents of another state, do not necessarily reside where they are fishing, we appreciate how USAC, not having this knowledge, could erroneously conclude that certain lines might not be eligible for universal service support due to their billing address and/or intermittent usage. Along with CWC’s explanations in its request for review, others¹ have offered substantial support for CWC’s position and justification for the reversal of USAC’s decision to deny support. In addition, other ATA members encounter similar circumstances with customers engaged in mining and oil fields as well as the fishing industry whose employment is such that they work for

¹ See Comments of General Communication Inc., CC Docket 96-45, WC Docket 05-337, (August 9, 2013) and Comments of Copper Valley Wireless, LLC, CC Docket 96-45, WC Docket 05-337, (August 9, 2013).

extended periods – weeks or seasons – in remote areas and live or are headquartered in urban Alaska or outside the state. The communications service in the remote areas is necessarily high-cost, and as it is critical for safety, business and access to family and community, it is utilized by customers when they are in the remote areas and often billed elsewhere.

In its comments, General Communication Inc. (“GCI”) points out that the Commission should clarify line count reporting prospectively so that ETCs will be able to project support revenues. Additionally, USAC should be encouraged to be less “wooden” in its interpretation of payment location. Most of the Commission’s rules are not promulgated with the idiosyncrasies of Alaska in mind and some rational flexibility in interpretation is often necessary for Alaskans to be fairly accommodated with citizens residing in states whose organization and communities pre-date Alaska statehood by a century or more.

We ask that the Commission direct USAC to adopt, generally, a more public-spirited manner in its consideration of these issues and to quickly review and reverse its decision regarding CWC.

Respectfully submitted this 26th day of August, 2013.

ALASKA TELEPHONE ASSOCIATION

A handwritten signature in black ink, appearing to read "Jim Rowe", with a long horizontal flourish extending to the right.

Jim Rowe
Executive Director